

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
(Greenbelt Division)

IN RE: NAHID AHMADPOUR

:  
:  
: Case No. 18-11248  
:  
Debtor. : Chapter 7

**OPPOSITION TO APPLICATION UNDER FED. R. BANKR. P. 9006(c)(1)  
FOR ORDER SHORTENING TIME PERIOD FOR NOTICE**

Debtor(s)' counsel, respectfully oppose Nationwide Registry & Security, Ltd's (the "movant") Application Under Fed. R. BankR. P. 9006(c)(1) for Order Shortening Period for Notice.

In support of this opposition, counsel states as follows:

1. On January 30, 2018, the debtor(s) filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code.
2. On or about February 5, 2018, the movant filed the above-referenced application, requesting to shorten the time period for a hearing to decide the merits on its Motion for Lift of Automatic Stay filed on February 5, 2018.
3. In that regard, the undersigned counsel states that there is no genuine emergency to shorten the time period for a hearing and the movant will not be unduly prejudiced if the time period for a hearing is not shorten. Moreover, the undersigned counsel's needs time to investigate the allegations as alleged in the movant's motion as to whether undersigned counsel will represent the debtor in the underlying lift stay matter and if so, would need additional time to draft an opposition. Lastly, the day and time proposed by the movant for the emergency hearing will be impossible for undersigned counsel to attend as a result of a previous scheduled hearing in the District of Columbia.

4. Therefore, counsel requests that the application filed by the movant be denied.

WHEREFORE, for these and such other reasons as may appear to the Court, counsel respectfully requests that the movant's application be denied.

By /s/ Kevin Judd  
Kevin D. Judd  
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CERTIFICATE OF SERVICE

I hereby certify that on February 5, 2018, a copy of the foregoing Opposition to Application Under Fed. R. BankR. P. 9006(c)(1) for Order Shortening Period for Notice was e-mailed to Chapter 7 Trustee Laura J. Margulies, Trustee and mailed first class postage pre-paid to:

Robert L. Vaughn, Jr., Esq.  
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/s/ Kevin Judd  
Kevin D. Judd